

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

QUINN HEATH,

Plaintiff,

v.

DEPARTMENT OF DEFENSE,

Defendant.

Civil Action No. 1:22-11811-AK

**ASSENTED-TO MOTION FOR ADDITIONAL TIME**

Defendants, through their attorney Rachael S. Rollins, United States Attorney for the District of Massachusetts, hereby move with the assent of Plaintiff for an additional thirty (30) days (**to February 13, 2023**) in which to file an answer or to otherwise respond to the Complaint in this case. As grounds herefor, Defendants state that the press of other cases has delayed the government's response, but that through conversations with agency counsel and Plaintiff, it is hoped that resolution of the dispute can occur without extensive litigation. Plaintiff's FOIA request is narrow, but obscure, and it will take time to determine if any responsive items can be located. The additional time period will avoid unnecessary, and possibly irrelevant, filings in the interim.

The Court's consideration of this Motion is greatly appreciated.

Respectfully submitted,

RACHAEL S. ROLLINS,  
United States Attorney

Dated: January 17, 2023

By: /s/ Thomas E. Kanwit  
Thomas E. Kanwit  
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**CERTIFICATE OF SERVICE AND L.R. 7.1 COMPLIANCE**

Counsel for Defendants certifies that he has consulted with counsel for Petitioner in an attempt to resolve the issue presented herein and further certifies that this motion will be filed using the Court's CM/ECF electronic filing system and served on all parties by that system.

/s/ Thomas e. Kanwit  
Thomas E. Kanwit